

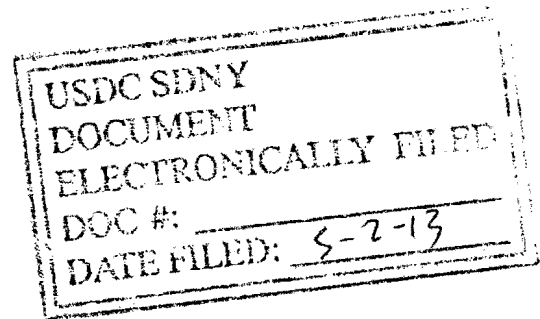
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MEMO ENDORSED

April 29, 2013

By Hand

Honorable Thomas P. Griesa
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007



Re: United States v. Franco, et al.
Ind. No. 12 Cr 932 (TPG)

Dear Judge Griesa:

This *ex parte* application is respectfully submitted on behalf of court-appointed counsel, in connection with my appointment as a Coordinating Discovery Attorney (CDA) on this matter. My office has processed the discovery materials that counsel had received prior to my appointment. We have provided counsel with those documents in searchable format, converted a portion of audio files into a standardized format that is easier to review, and provided a PDF index to assist in searches across the documents. We continue to develop and provide tools that save counsel both time and funds.

On April 17, 2013, I received from the Government three (3) hard drives that contain over four (4) terabytes of data. They include a variety of discovery, the bulk of which is, as expected, stationary camera video files provided in three (3) proprietary software programs. On April 26, 2013, I received a copy of the Government's "Video Summaries" document, which contains identifiable information that corresponds to these video files. The document, at 36 pages, is extensive, and it includes names, nicknames, dates and times, among other information.

The "Video Summaries" document will be used to isolate files pertinent to specific defendants, but it will be necessary to also work closely with counsel, as they review the

Approved:
Thomas P. Griesa
✓ SDJ 5/2/13

document, to isolate additional files of interest. The goal is to produce for each counsel a copy of files most pertinent to their cases, for ease of review.

I recommend that this project would be most effective, in both time and cost, if executed by a paralegal that may devote focused time to the review of the lengthy video summary, consult with individual counsel as to additional dates and times of interest in the data set, and parse the respective files for individual attorneys onto individual devices. I have supervised a paralegal in another case to which I am appointed a CDA in the Southern District of New York on a similar project that involved a large volume of pole camera video (3 terabytes). The paralegal's appointment in that case worked out well for counsel and for the Court.

Doug Tritz has a certificate in paralegal studies from Pace University and has experience working on CJA cases in our area, including one capital case. I have reviewed with him the skills necessary to complete the project, and I believe he is qualified to do so. Most importantly, he is available immediately.

Accordingly, I respectfully request that, at an initial cap of 100 hours, the Court approve funds for Doug Tritz to assist as a paralegal in this matter at a rate of \$35 per hour, the lowest presumptive hourly paralegal rate approved by the Second Circuit.¹ Upon Your Honor's approval, I will supervise the paralegal and his work with counsel.

Thank you for the Court's consideration of this matter.

Respectfully submitted,



Emma M. Greenwood
Coordinating Discovery Attorney

EMG/ss

Cc: All Defense Counsel (via Email)

¹ "Second Circuit Judicial Council Committee on Criminal Justice Act Representation Policy and Procedure Manual, Appendix "E""